

Jeffrey A. Lipps (admitted *pro hac vice*)
Jennifer A.L. Battle
David A. Beck (admitted *pro hac vice*)
CARPENTER LIPPS & LELAND LLP
1540 Broadway, Suite 3710
New York, NY 10036
Phone: (212) 837-1110

Special Litigation Counsel to the ResCap Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, et al.,

Debtors.

Case No. 12-12020 (MG)

Chapter 11

Jointly Administered

**NOTICE OF STIPULATION AND PROTECTIVE ORDER
FOR DISCOVERY RELATED TO PROOFS OF
CLAIM FILED BY UBS REAL ESTATE SECURITIES, INC.**

PLEASE TAKE NOTICE that the ResCap Liquidating Trust and UBS Real Estate Securities, Inc. (“UBS”) hereby file the Stipulation and Protective Order for Discovery Related to Proofs of Claim Filed by UBS Real Estate Securities, Inc. (the “Stipulation”), attached hereto as Exhibit A in connection with discovery related to UBS’s claims which were objected to as part of the *Debtors’ Fifty-Second Omnibus Objection to Claims (Insufficient Documentation)* [Docket No. 6074]. The parties request that the Court so order the Stipulation.

Dated: February 20, 2014

/s/ David A. Beck

Jeffrey A. Lipps (admitted *pro hac vice*)

lipps@carpenterlipps.com

Jennifer A.L. Battle

battle@carpenterlipps.com

David A. Beck (admitted *pro hac vice*)

beck@carpenterlipps.com

CARPENTER LIPPS & LELAND LLP

1540 Broadway, Suite 3710

New York, NY 10036

Phone: (212) 837-1110

*Special Litigation Counsel to the ResCap Liquidating
Trust*